

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

LACI N. BLANCARD, ET AL.	CIVIL ACTION NO: 4:22-cv-02420
VERSUS	DISTRICT JUDG: GEORGE C. HANKS, JR.
SANARE ENERGY PARTNERS, LLC, ET AL.	MAGISTRATE JUDGE: ANDREW M. EDISON

**SECOND UNOPPOSED MOTION TO EXTEND SUBMISSION DATE OF
ALL COAST’S MOTION FOR SUMMARY JUDGMENT**

TO JUDGE HANKS:

COMES NOW, through undersigned counsel, Defendant, Sanare Energy Partners, LLC (“Sanare”), in the above-entitled and numbered cause, and files this Second Unopposed Motion to Extend Submission Date of All Coast, LLC’s (“All Coast”) Motion for Summary Judgment on its Crossclaim for Defense and Indemnity (“Motion for Summary Judgment”), and in support thereof would show unto the Court as follows, to-wit:

Defendant, All Coast, filed its Motion for Summary Judgment [Dkt. #45] on February 6, 2024. Sanare’s Opposition to the Motion for Summary Judgment is due on March 1, 2024 [Dkt. #48]. On February 26, 2024, All Coast produced its Rule 26 initial disclosures to all parties. Its production totaled approximately 340 pages. Counsel for All Coast extended an offer to continue the deadline for Sanare to file its Opposition to its Motion for Summary Judgment so as to allow Sanare sufficient time to review its production. Thus, Sanare requests that the Court extend the submission date of the Motion for Summary Judgment to March 15, 2024. Counsel for All Coast and counsel for Plaintiff consent to this request and the filing of this Motion.

For the reasons stated above, Defendant, Sanare, respectfully requests the Court grant this Second Unopposed Motion to Extend Submission Date of Defendant, All Coast, LLC's Motion for Summary Judgment on its Crossclaim for Defense and Indemnity. This motion is not made for the purpose of delay but so that justice may be done. Defendant, Sanare, prays for further relief, both in law and in equity to which they may show themselves justly entitled.

Respectfully submitted,

/s/ Constance C. Waguespack

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CERTIFICATE OF CONFERENCE

On February 28, 2024, counsel for Sanare, Constance Waguespack, contacted counsel for Plaintiff and All Coast, LLC by email requesting their position on the Second Unopposed Motion to Extend Submission Date of All Coast's Motion for Summary Judgment, which is attached to this motion as *Exhibit 1*.

Plaintiff's counsel responded on February 28, 2024 by email and stated they agreed to the filing of the Second Unopposed Motion to Extend Submission Date of All Coast's Motion for Summary Judgment.

Counsel for All Coast, LLC responded on February 28, 2024 by email and stated they agreed to the filing of the Second Unopposed Motion to Extend Submission Date of All Coast's Motion for Summary Judgment.

/s/ *Constance C. Waguespack*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been served on all counsel of record via U.S. Mail, return receipt requested, or through the Clerk of this Court on February 29, 2024.

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/s/ Constance C. Waguespack
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	MAGISTRATE JUDGE:
	ANDREW M. EDISON

ORDER

The submission date for All Coast's Motions for Summary Judgment [Dkt. 45] is extended to March 15, 2024. Sanare's response to this motion is due by the submission date.

Signed at Houston, Texas on the ____ day of _____, 2024.

GEORGE C. HANKS, JR.
UNITED STATES DISTRICT JUDGE